

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Hadia A Ahmed

Debtor(s)

LoanCare, LLC, or its Successor or Assignee
Movant

vs.

WILLIAM C. MILLER, Esq., Trustee
Hadia A Ahmed

Respondent(s)

Chapter 13
Bankruptcy No. 19-12588-elf

CERTIFICATION OF DEFAULT

I, Lauren M. Moyer, attorney for LoanCare, LLC, or its Successor or Assignee, in accordance with Settlement Stipulation approved by the Court December 9, 2019 and attached hereto as Exhibit "A", hereby certify the following:

1. That Debtor, Hadia A Ahmed has failed to maintain payments as described in said Settlement Stipulation.
2. That a Notice of Default was served upon Debtor and Debtor's counsel by United States Mail, first class, postage prepaid, on March 30, 2021; a true and correct copy of such Notice is attached hereto, made a part hereof, and marked as Exhibit "B"
3. That ten (10) days have elapsed, and Debtor has failed to cure the delinquency.
4. That upon filing this Certification, in accordance with the Settlement Stipulation, an Order shall be entered granting LoanCare, LLC, or its Successor or Assignee relief from the automatic stay to foreclose its mortgage and, without limitation, to exercise any other rights it has under the mortgage or with respect to Debtor(s)' property located at 31 Millbourne Avenue, Upper Darby, Pennsylvania 19082.

/s/ Lauren M. Moyer, Esquire
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